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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 13-00336 RS
)	12-10016CR-MARTINEZ
Plaintiff,)	
)	STIPULATION TO CONTINUE AND
v.)	[PROPOSED] ORDER
)	
DEAN TUAN TRINH,)	
)	
Defendant.)	

The above-captioned matter came before the Court July 9, 2013, at 2:30 p.m. for a status hearing. The Court put the matter over to August 6, 2013, at 2:30 p.m. The parties jointly agreed that time should be excluded under the Speedy Trial Act because the defense attorney requires additional time to review the discovery and conduct additional investigation. The parties represent that granting the exclusion would allow the reasonable time necessary for production and review of discovery and for effective preparation. See 18 U.S.C. § 3161(h)(7)(B)(iv). Therefore the parties request an exclusion of time from July 9, 2013 through August 6, 2013, from any time limits applicable under 18 U.S.C. § 3161.

For the reasons stated above, the Court finds that the exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from July 9, 2013 through August 6,

2013 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested exclusion of time would deny counsel for the defendant and for the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. 18 U.S.C. §3161(h)(7)(B)(iv).

DATED: July 10, 2013


/s/
WILLIAM SAFFORD
Attorney for Dean Tuan Trinh

DATED: July 10, 2013

/s/
MAUREEN C. BESSETTE
Assistant U.S. Attorney

IT IS SO ORDERED.

DATED: 7/10/13


HON. RICHARD SEEBORG
United States District Judge